

Bureau of Labor Statistics, 2019

Burden Item	(A) Person hours per occurrence	(B) No. of occurrences per respondent per year	(C) Person hours per respondent per year (C=AxB)	(D) Respondents per year <sup>a</sup>
1. Applications	N/A			
2. Surveys and studies	N/A			
3. Reporting requirements				
a. Familiarization with the regulatory requirement	1	1	1	202
b. Required activities				
i. Initial performance test – process vents <sup>c</sup>	480	1	480	1
ii. Initial performance test – wastewater <sup>c</sup>	160	1	160	1
iii. Initial CMS performance evaluation <sup>d</sup>	10	1	10	0
iv. Repeat performance test	20	1	20	1
c. Create information	See 3E			
d. Gather existing information	See 3E			
e. Write report				
i. Notification of construction/reconstruction	2	1	2	1
ii. Notification of actual startup	2	1	2	1
iii. Initial notification	2	1	2	1
iv. Emissions averaging plan <sup>e</sup>	40	1	40	0
v. Pre-compliance report <sup>f</sup>	40	1	40	1
vi. Performance test notification <sup>g</sup>	2	1	2	1
vii. Notification of initial CMS performance evaluation	2	1	2	0
viii. Notification of compliance status				
a. With performance test <sup>g</sup>	80	1	80	1
b. Without performance test <sup>h</sup>	120	1	120	0
ix. Notification of physical/operational change <sup>i</sup>	8	1	8	20.2
x. Semiannual summary report				
a. No deviations <sup>j</sup>	8	2	16	181.8
b. Deviations <sup>j</sup>	24	2	48	20.2
c. SS&M report <sup>k</sup>	8	2	16	202
d. LDAR report <sup>l</sup>	404	2	808	202
e. Emission averaging report <sup>m</sup>	20	2	40	20.1
<b>Subtotal for Reporting Requirements</b>				
4 Recordkeeping requirements				
a. Familiarize with the regulatory requirements	See 3E			
b. Plan activities	N/A			
c. Implement activities	N/A			
d. Develop record system <sup>n</sup>	40	1	40	1
e. Develop SS&M plan <sup>o</sup>	100	1	100	1
f. Develop QA/QC plan for CMS <sup>p</sup>	40	1	40	0
g. Time to train personnel <sup>q</sup>	40	1	40	1

h. Time to retrain/refresh personnel <sup>r</sup>	16	1	16	201
i. Time to enter information				
i. Records of SS&M	1.5	52	78	202
ii. Records of CMS data <sup>s</sup>				
a. Record of continuously monitored parameters	1	365	365	202
b. Compile data	24	2	48	202
c. Enter/verify information for semiannual report	16	2	32	202
j. Calibration of CMS <sup>t</sup>	16	1	16	202
<b>Subtotal for Recordkeeping Requirements</b>				
<b>Total Annual Labor Burden and Costs (rounded) <sup>u</sup></b>				
<b>Capital and O&amp;M Cost (rounded): <sup>u</sup></b>				
<b>Grand Total (rounded): <sup>u</sup></b>				

<sup>a</sup> We have assumed that there are 201 existing facilities subject to the rule, and that one new major source per year will become to this rule is 202.

<sup>b</sup> This ICR uses the following labor rates: \$147.40 per hour for Executive, Administrative, and Managerial labor; \$117.92 per hour rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2018, Table 2. Civilian Workers, by Occ Compensation. The rates have been increased by 110 percent to account for the benefit packages available to those employed by

<sup>c</sup> This will occur only in the first year after a facility becomes subject to the rule.

<sup>d</sup> Person-hours per occurrence are based on the performance specification costs to certify CMS (\$500) divided by the composite parameter monitoring systems included in the rule. Assumes no facilities will use the alternative standard, which required CEM

<sup>e</sup> We have assumed that 10 percent of existing facilities will comply with emissions averaging requirements and have previously emissions averaging.

<sup>f</sup> Assumes 1 new facility will submit a pre-compliance report.

<sup>g</sup> We have assumed that 1 new facility will comply by conducting a performance test(s). The notification of compliance status is

<sup>h</sup> We have assumed that no new facilities will comply by submitting engineering calculations, design calculations, etc. with no calculations.

<sup>i</sup> We have assumed that 10 percent of facilities will implement process changes

<sup>j</sup> We have assumed that 90 percent of facilities will have no deviations, only 10 percent will have deviations.

<sup>k</sup> We assume that all facilities will report actions taken during startup, shutdown, or malfunction that are consistent with the SS&

<sup>l</sup> Assumes 404 hours for completion of the LDAR report.

<sup>m</sup> We have assumed that 10 percent of existing facilities will comply with emissions averaging requirements; new facilities are

<sup>n</sup> We have assumed that it will take 40 hours for each respondent to develop a record system for recording parameter monitoring

<sup>o</sup> We have assumed that it will take 80 hours for each respondent to draft the startup, shutdown, and malfunction plan and another

<sup>p</sup> We have assumed that it will take 40 hours to develop and review the QA/QC plan for the CMS. No QA/QC plan is required if assumed that no facility will use the alternative standard, which requires CEMS and QA/QC plans.

<sup>q</sup> We have assumed that it will take 40 hours to train personnel.

<sup>r</sup> We have assumed it will take 20 days (16 hours) to provide refresher training for personnel.

<sup>s</sup> The record of continuously monitored parameters includes: process vent, storage tank, and wastewater monitoring and inspection

<sup>t</sup> We have assumed that calibration of CMS will require 8 hours per year for each monitor. We are assuming a total of 2 CMS for

<sup>u</sup>Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

117.92      147.4      57.02

(E) Technical person- hours per year (E=CxD)	(F) Managem ent person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year, \$ <sup>b</sup>
202	10.10	20.20	\$26,460.38
480	24	48	\$62,876.16
160	8	16	\$20,958.72
0	0	0	\$0
20	1	2	\$2,619.84
2	0.10	0.20	\$261.98
2	0.10	0.20	\$261.98
2	0.10	0.20	\$261.98
0	0	0	\$0
20	1	2	\$2,619.84
2	0.10	0.20	\$261.98
0	0	0	\$0
80	4	8	\$10,479.36
0	0	0	\$0
161.6	8.08	16.16	\$21,168.31
2,908.8	145.44	290.88	\$381,029.53
969.6	48.48	96.96	\$127,009.84
3,232	161.60	323.20	\$423,366.14
163,216	8,160.80	16,321.60	\$21,379,990.27
804	40.20	80.40	\$105,317.57
<b>198,101</b>			<b>\$22,564,943.90</b>
40	2	4	\$5,239.68
100	5	10	\$13,099.20
0	0	0	\$0
40	2	4	\$5,239.68

3,216	160.80	321.60	\$421,270.27
15,756	787.80	1,575.60	\$2,063,909.95
73,730	3,686.50	7,373.00	\$9,658,040.16
9,696	484.80	969.60	\$1,270,098.43
6,464	323.20	646.40	\$846,732.29
3,232	161.60	323.20	\$423,366.14
<b>129,115</b>			<b>\$14,706,996</b>
<b>327,000</b>			<b>\$37,300,000</b>
			<b>\$4,310,000</b>
			<b>\$41,600,000</b>

subject. Therefore, the average number of respondents that are subject

our for Technical labor, and \$57.02 per hour for Clerical labor. These  
occupational and Industry group. The rates are from column 1, Total  
y private industry.

hourly labor rate. No performance evaluations are required for the  
S and performance evaluations.

y submitted an averaging plan; new facilities are not allowed to use

ncludes the report of the performance test(s).

performance tests. The notification of compliance status includes those

EM plan.

not allowed to use emissions averaging.

g information.

er 20 hours of review/revisions, for a total of 100 hours.

or the parameter monitoring systems included in the rule. We have

ions.

or each facility, for a total requirement of 16 hours per year per facility.

Annual number of respondents (total)	202
Annual avg number of existing respondents	201
Annual avg number of new respondents	1

255

hr per resp

2015 General Schedule

Activity	(A) EPA person hours per occurrence	(B) No. of occurrences per plant per year	(C) EPA person hours per respondent per year (C=AxB)	(D) Plants per year <sup>a</sup>
1. Review notification of construction/reconstruction	2	1	2	1
2. Review notification of actual startup	1	1	1	1
3. Review initial notification	2	1	2	1
4. Review emissions averaging plan <sup>c</sup>	20	1	20	0
5. Review pre-compliance report <sup>d</sup>	4	1	4	1
6. Review notification of initial performance test	2	1	2	1
7. Review notification of initial CMS demonstration	2	1	2	0
8. Review notification of compliance status report				
i. With performance test <sup>e</sup>	40	1	40	1
ii. Without performance test <sup>f</sup>	40	1	40	0
9. Review notification physical/operational change <sup>g</sup>	8	1	8	20.2
10. Review semiannual summary report				
i. No deviations <sup>h</sup>	2	2	4	181.8
ii. Deviations <sup>h</sup>	8	2	16	20.2
iii. SS&M report <sup>i</sup>	2	2	4	202
iv. LDAR report <sup>j</sup>	8	2	16	202
v. Emission averaging report <sup>c</sup>	8	2	16	20.1
<b>Subtotals Labor Burden and cost</b>				
<b>Total Annual Labor Burden and Costs (rounded)<sup>k</sup></b>				

<sup>a</sup> We have assumed that there are 201 existing facilities subject to the rule, and that one new major source per year will that are subject to this rule is 202.

<sup>b</sup> This cost is based on the following labor rates which incorporates a 1.6 benefits multiplication factor to account for gr 60%) for Managerial rate, \$48.75 (GS-12, Step 1, \$30.47 + 60%) for Technical rate, and \$26.38 (GS-6, Step 3, \$16.49 Personnel Management (OPM) “2018 General Schedule” which excludes locality rates of pay.

<sup>c</sup> We have assumed that 10 percent of existing facilities will comply with emissions averaging requirements and have p allowed to use emissions averaging.

<sup>d</sup> We have assumed one new facility will submit a pre-compliance report.

<sup>e</sup> We have assumed that one new facility will comply by conducting a performance test(s). The notification of compliar

<sup>f</sup> We have assumed that no new facilities will comply by submitting engineering calculations, design calculations, etc. v includes those calculations.

<sup>g</sup> We have assumed that 10 percent of facilities will implement process changes.

<sup>h</sup> We have assumed that 90 percent of facilities will have no deviations, 10 percent will have deviations.

<sup>i</sup> We have assumed that all facilities will report actions taken during startup, shutdown, or malfunction that are consiste

<sup>j</sup> We have assumed that all facilities will report the specified information for processes subject to the equipment leak str

<sup>k</sup> Totals have been rounded to 3 significant figures. Figures may not add exactly due to rounding.

48.75      65.71      26.38

(E) Technical person- hours per year (E=CxD)	(F) Managem ent person hours per year (Ex0.05)	(G) Clerical person hours per year (Ex0.1)	(H) Total Cost per year, \$ <sup>b</sup>
2	0.10	0.20	\$109.35
1	0.05	0.10	\$54.67
2	0.10	0.20	\$109.35
0	0	0	\$0
4	0.20	0.40	\$218.69
2	0.10	0.20	\$109.35
0	0	0	\$0
40	2	4	\$2,186.94
0	0	0	\$0
161.6	8.08	16.16	\$8,835.24
727.2	36.36	72.72	\$39,758.57
323.2	16.16	32.32	\$17,670.48
808	40.40	80.80	\$44,176.19
3,232	161.60	323.20	\$176,704.75
321.6	16.08	32.16	\$17,583.00
	6,468		\$307,516.57
	<b>6,500</b>		<b>\$308,000</b>

Annual avg number of respondents (total)

Annual avg number of existing  
respondents

Annual avg number of new respondents

become subject. Therefore, the average number of respondents

overnment overhead expenses: \$65.71 (GS-13, Step 5, \$41.07 +  
+ 60%) for Clerical rate. These rates are from the Office of

reviously submitted an averaging plan; new facilities are not

rice status includes the report of the performance test(s).

with no performance tests. The notification of compliance status

nt with the SS&M plan.

andards.

202

201

1